

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PLATINUM-BEECHWOOD LITIGATION,	:	X	
	:		Case No. 1:18-cv-06658 (JSR)
	:		
	:		
	:	X	
MELANIE L. CYGANOWSKI, AS RECEIVER FOR	:		
PLATINUM PARTNERS CREDIT OPPORTUNITIES	:		
MASTER FUND LP, PLATINUM PARTNERS	:		
CREDIT OPPORTUNITIES FUND (TE) LLC,	:		
PLATINUM PARTNERS CREDIT OPPORTUNITIES	:		
FUND LLC, PLATINUM PARTNERS CREDIT	:		Case No. 1:18-cv-12018 (JSR)
OPPORTUNITIES FUND INTERNATIONAL LTD.,	:		
PLATINUM PARTNERS CREDIT OPPORTUNITIES	:		
FUND INTERNATIONAL (A) LTD., and PLATINUM	:		
PARTNERS CREDIT OPPORTUNITIES FUND (BL)	:		
LLC,	:		
	:		
Plaintiff,	:		
	:		
v.	:		
	:		
BEECHWOOD RE LTD., <i>et al.</i> ,	:		
	:		
	:		
Defendants.	:	X	

NOTICE OF SETTLEMENT

PLEASE TAKE NOTICE that, in accordance with the Court’s Scheduling Order dated April 7, 2020 [Dkt. No. 527], as extended by email dated June 17, 2020, plaintiff Melanie L. Cyganowski, as duly appointed receiver for the above-captioned Platinum entities (the “*Receiver*”), has executed settlement agreements with the following parties (collectively, the “*Settlement Agreements*”):

- Defendant Senior Health Insurance Company of Pennsylvania;
- Defendant BAM Administrative Services; and

- Defendants Beechwood Bermuda International Ltd., Beechwood Bermuda Ltd. and Beechwood Re Ltd.

The Receiver has filed a motion dated July 1, 2020 before the Honorable Brian M. Cogan, United States District Judge for the United States District Court for the Eastern District of New York, Case No. 16-06848 [Dkt Nos. 535-537] (the “**Receivership Court**”) for an order approving the Settlement Agreements (the “**Approval Motion**”), a copy of which is attached as Exhibit A hereto. Accordingly, the Receiver respectfully requests that the Court defer ruling on motions for summary judgment until the Receivership Court rules on the Approval Motion.

Dated: New York, New York
July 1, 2020

Respectfully submitted,

OTTERBOURG P.C.

By: /s/ Erik B. Weinick
Erik B. Weinick
William M. Moran
Andrew S. Halpern

230 Park Avenue
New York, New York 10169
(212) 661-9100
*Attorneys for Plaintiff Melanie L.
Cyganowski, as Receiver*

CERTIFICATE OF SERVICE

It is hereby certified that on this 1st day of July, 2020, a copy of the foregoing was served through the Court's electronic filing system to the following counsel:

Aidan M. McCormack, Esq.
Robert B. Seibert, Esq.
DLA Piper US LLP (NY)
1251 Avenue of the Americas, 27th Floor
New York, NY 10020

Ellen E. Dew, Esq.
James D. Mathias, Esq.
Emily M. Steiner, Esq.
Darryl L. Tarver, Esq.
Amor N. Thupari, Esq.
DLA Piper US LLP (MD)
6225 Smith Avenue
Baltimore, MD 21209

Ira S. Lipsius, Esq.
Lipsius-Benhaim Law, LLP
80-02 Kew Gardens Road, Suite 1030
Kew Gardens, NY 11415

*Attorneys for Defendants BAM
Administrative Services, Beechwood
Bermuda International Ltd., Beechwood
Bermuda Ltd. and Beechwood Re Ltd.*

*Attorneys for Defendant Senior Health
Insurance Company of Pennsylvania*